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9 Attorneys for Defendant

10 UNITED STATES DISTRICT COURT

11 DISTRICT COURT OF NEVADA

12 UNITED STATES OF AMERICA,)

13 Plaintiff,)

14 vs.)

15 ROBERT BOLTEN)

16 Defendant.)

CASE NO. 2:12-cr-00113-JCM-VCF-3

STIPULATION AND PROPOSED ORDER
TO CONTINUE REVOCATION HEARING
(Third Request)

17 It is hereby stipulated and agreed between the United States of America, by and through
18 Nicholas A. Trutanich, United States Attorney, and Daniel J. Cowhig, Assistant United States
19 Attorney and Michael V. Castillo. Esq, counsel for Defendant ROBERT BOLTEN that the
20 revocation hearing currently set for Wednesday, September 25th, 2019 at 10:00 a.m. in Courtroom
21 6A before the Honorable James C. Mahan be vacated and continued to a date and time convenient
22 to the Court but no earlier than sixty days. This stipulation is entered into for the following reasons:

- 23 1. This is a joint request by Counsel for the United States and for the Defendant for a
24 continuance.
25

- 1 2. The Petition for Revocation of Supervised Release alleges that the Defendant
2 committed a new offense while under supervision.
- 3 3. That said offense is currently pending in Las Vegas Justice Court in Case No.
4 19F11584X with a Status Check Negotiations date of October 3rd, 2019 at 8:30 a.m.
- 5 4. That the Defendant is currently being supervised on home confinement with location
6 monitoring.
- 7 5. That the Defendant does not object to this request for a continuance.
- 8 6. That this is the third request for a continuance of the revocation hearing.

9 A proposed order is attached.

10 RESPECTFULLY SUBMITTED this 23rd day of September 2019.

11
12 /s/ Daniel J. Cowhig.
13 Daniel J. Cowhig
14 Assistant United States Attorney

15 /s/ Michael V. Castillo, Esq
16 Michael V. Castillo, Esq.
17 Nevada Bar No. 11531
18 Attorneys for Robert Bolten
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1 UNITED STATES DISTRICT COURT
2 DISTRICT COURT OF NEVADA

3 UNITED STATES OF AMERICA,)
4)
5 Plaintiff,)
6 vs.)
7)
8 ROBERT BOLTEN,)
9)
10 Defendant.)

CASE NO. 2:12-cr-00113-JCM-VCF-3

FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER CONTINUING
REVOCATION HEARING

11 FINDINGS OF FACT

12 Based on the pending stipulation of counsel, and good cause appearing therefore, the Court
13 finds that:

- 14 1. This is a joint request by Counsel for the United States and for the Defendant for a
15 continuance.
- 16 2. The Petition for Revocation of Supervised Release alleges that the Defendant
17 committed new offenses while under supervision.
- 18 3. That said offense is currently pending in Las Vegas Justice Court in Case No.
19 19F11584X with a Status Check Negotiations date of October 3rd, 2019 at 8:30 a.m.
- 20 4. That the Defendant is currently being supervised on home confinement with location
21 monitoring.
- 22 5. That the Defendant does not object to this request for a continuance.
- 23 6. That this is the third request for a continuance of the revocation hearing.
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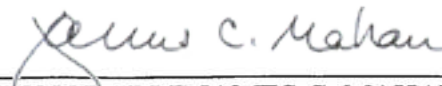
CONCLUSIONS OF LAW

For all of the above stated reasons, the ends of justice would be served by granting a continuance of the sentencing hearing.

ORDER

IT IS THEREFORE ORDERED, that the hearing regarding revocation currently scheduled for Wednesday, September 25th, 2019 at 10:00 a.m., be continued to the 4th day of December, 2019 at 10:00 a.m. in Courtroom 6A before Judge James C. Mahan.

IT IS SO ORDERED September 24, 2019.



HONORABLE JAMES C. MAHAN
UNITED STATES DISTRICT COURT JUDGE


Respectfully submitted by:

s/ Michael V. Castillo, Esq
Michael V. Castillo, Esq.
Nevada Bar No. 11531
Attorney for Robert Bolten

CERTIFICATE OF SERVICE

I certify that I am employee of Las Vegas Defense Group, LLC. A copy of the above
STIPULATION AND PROPOSED ORDER TO CONTINUE REVOCATION HEARING (First
Request) was served upon counsel of record via Electronic Case Filing (ECF)

Dated this 23rd day of September, 2019



An Employee of Las Vegas Defense Group, LLC.